

Engine/Evaporative Systems Information ESI/EvST

TABLE 3. LETTER CODES FOR VEHICLE CLASS (Continued)

California Medium Duty

Code	Designation	GVWR	ALVW
G	MDT-1	>6000	0- 3750
H	MDT-2		3751- 5750
J	MDT-3		5751- 8500
K	MDT-4		8501-10000
L	MDT-5		10001-14000

Note that EPA has not always made a consistent distinction between values of loaded vehicle weight '>3750', '≥3751' and '3751-5750' pounds. Much of the problem has occurred because several different systems have been used to define emission standards. These include (1) The Clean Air Act Amendments, (2) Federal Regulations for years before 1994, (3) descriptive language in Federal Regulations for 1994 and later, (4) tables of standards in Federal Regulations for 1994 and later, (5) Federal Regulations for Cold CO, (6) Dear Manufacturer letter CD-91-08, December 12, 1991, subject: *Revised Engine Family Name and New Evaporative Family Name*, and (7) EPA computer systems. For example, 40 CFR 86.094-2 defines a Light-duty truck 2 to be any light light-duty truck with a loaded vehicle weight greater than 3750 lbs. On the other hand, Tables A94-8, ..., A94-12 in the same document specify the LVW weight range for emission standards for light light-duty trucks to be 3751-5750 lbs. For vehicles that meet Tier 0 standards, these tables are inconsistent with the regulations that were in effect for 1993 and earlier model years and that specify loaded vehicle weight range to be greater than 3750 lbs. From an engineering perspective, there is no significant difference between the two. From a data processing point of view, however, the distinction is important because computer software determines an LVW weight range from an engine family name and attempts to find matching data in an emission standards data base. Computer software that compares character strings will not necessarily consider '>3750', '≥3751' and '3751-5750' to be the same. To minimize problems for manufacturers, EPA attempts to translate entered values into preferred codes. For this reason, '>3750' and '≥3751' are considered equivalent and either will be accepted as input, although EPA has made an arbitrary decision to print '≥3751' on result reports. On the other hand, value '3751-5750' is not considered equivalent to '>3750' or '≥3751'.

Tables 3 above have been modified to specify the LVW weight ranges actually used by the ESI/EvSI program. For 1995 model year light duty trucks that have Tier 1 standards, the values are the same as the ones used in Tables A94.8...A94-15 in 40 CFR 86-094. For 1995 light duty trucks that meet Tier 0 standards, LVW weight range value '≥3751' has